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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )

Implementation of Sections of the )  
Cable Television Consumer Protection )  
and Competition Act of 1992 )

MM Docket No.  
92-266

RATE REGULATION )

To: The Commission

COMMENTS IN SUPPORT OF THE PETITION  
OF THE NATIONAL CABLE TELEVISION ASSOCIATION, INC.  
FOR LIMITED STAY OF THE EFFECTIVE DATE

Blade Communications, Inc., Colony Communications, Inc.,  
Consolidated Cablevision of California, L.P., Consolidated  
Cablevision of Michigan, L.P., King Videocable Company,  
MultiVision Cable TV Corp., ParCable, Inc., and Sammons

rate structure changes to take place in an environment where rate increases are not also being implemented.

As recently as May 7, 1993, after release of the Report and Order on May 3rd, the Commission reaffirmed, in its Public Notice on Cable Television Rate Regulation, its position that:

Certain changes in tier and equipment rate structures are anticipated during the freeze period in order to comply with the new rate rules so that, for example, the price of one tier may decrease while the price of another is increased. Such changes are allowed as long as the average subscriber charge is not increased.

Following this guidance provided by the Commission, the Cable Companies are in the process of reviewing their rate structures to determine whether adjustments in keeping with existing overall rate levels can and should be made. Until the release of the Report and Order on May 3rd, however, it was not possible even to preliminarily ascertain what adjustments might be appropriate; the sheer volume of effort involved in applying the new rate guidelines to hundreds of individual systems will require further time to evaluate.

The Cable Companies share NCTA's concern that the Report and Order's June 21, 1993 effective date and ensuing implementation schedule may have the inadvertent and unintended effect of constraining their ability to effectuate rate adjustments which are currently being evaluated and implemented. To avoid this possible result, cable operators

may be forced to make hasty and less than fully informed restructuring decisions; these may have to be revisited and revised and, contrary to the Commission's intention, may increase rather than diminish the complexities and confusion attending the implementation of the rate regulation process by local authorities and by the Commission. Moreover, cable subscribers would not be well served by precipitous notices of rate restructuring which may subsequently have to be corrected; this scenario could have the unfortunate effect of undermining the public's confidence in the credibility of the rate regulation process.


Accordingly, the Cable Companies urge the Commission to issue a clear statement, whether by a limited stay of the Report and Order's effective date or otherwise, that nothing

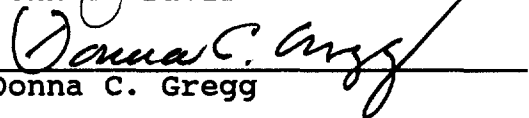
permissible restructuring as contemplated and authorized by  
the freeze decisions.

Respectfully submitted,

Blade Communications, Inc.  
Colony Communications, Inc.  
Consolidated Cablevision of  
California, L.P.  
Consolidated Cablevision of  
Michigan, L.P.  
King Videocable Company  
MultiVision Cable TV Corp.  
ParCable, Inc.  
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May 11, 1993